

REMARKS/ARGUMENTS

This Amendment After Final is being filed in response to the Final Office Action dated May 19, 2008. Reconsideration and allowance of the application in view of the remarks to follow are respectfully requested.

Claims 1-20 are pending in the application. Claims 1, 15 and 20 are independent claims.

In the Final Office Action, claims 1-3, 7 and 11-15 are rejected under 35 U.S.C. §102(b) as allegedly anticipated by U.S. Patent Application Publication No. 2003/0061504 to Sprigg ("Sprigg"). Claims 4, 6 and 20 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Sprigg in view of U.S. Patent No. 6,904,232 to Ayat ("Ayat") and U.S. Patent No. 6,414,920 to Lee ("Lee"). Claim 5 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Sprigg, Ayat and Lee in view of U.S. Patent No. 4,577,289 to Comerford ("Comerford"). Claim 8 is rejected under 35 U.S.C. §103(a) over Sprigg in view of U.S. Patent No. 5,724,425 to Chang ("Chang"). Claims 9 and 10 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Sprigg in view of U.S. Patent No. 6,292,874 to Barnett ("Barnett"). Claim 16 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over

Sprigg in view of U.S. Patent No. 5,881,228 to Atkinson ("Atkinson"). Claim 17 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Sprigg in view of U.S. Patent Application Publication No. 2001/0011338 to Bonola ("Bonola"). Claims 18-19 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Sprigg in view of U.S. Patent No. 6,629,113 to Lawrence ("Lawrence").

These rejections are respectfully traversed. It is respectfully submitted that claims 1-20 are allowable over Sprigg alone and in view of any combination of Ayat, Lee, Comerford, Chang, Barnett, Atkinson, Bonola and Lawrence for at least the following reasons.

Sprigg shows a system for granting an application that is stored in a storage area 110, access to the storage area. As stated in Sprigg (emphasis added), [t]he storage area 110 of the computer device 105 is used to store data and applications received into the computer device 105." (See, FIG. 1 and accompanying text in paragraph [0026].) Accordingly, it is respectfully submitted that Sprigg teaches allocating a portion of a common storage area to an application and data related to the application.

The Final Office Action cites several paragraphs of Sprigg for showing the elements of claims 1 and 15, however, it is respectfully submitted that reliance in Sprigg is misplaced. For example paragraph [0013] cited in the Final Office Action makes clear that (emphasis added) the "invention [of Sprigg] provides a method for storing an application on a device, comprising the steps of receiving the application at the device, storing the application in a storage on the device, and limiting access of the application to a unique portion on the storage ..." Similarly, cited paragraph [0034] makes clear that a "network may be used to send an application to a computer device, such as the wireless device 230. The application ... has a digital signature ... [that] may be bound to the application and stored on the wireless device either bound [together with the application] or separate ..." As further made clear in Sprigg, "the root of the file structure defines the files to be stored in this portion of the storage area. Subdirectories to the File root directory 300 include Applications 305 and Shared 310. As the computer device receives applications, they are stored in subdirectories (e.g., App X 315 and App Y 320) under the Applications directory 305." (See, Sprigg, paragraph [0036].)

It is respectfully submitted that the device of claim 1 and

the method of claim 15 are not anticipated or made obvious by the teachings of Sprigg alone and in view of any combination of Ayat, Lee, Comerford, Chang, Barnett, Atkinson, Bonola and Lawrence. For example, Sprigg alone and in view of any combination of Ayat, Lee, Comerford, Chang, Barnett, Atkinson, Bonola and Lawrence does not disclose or suggest, a device that amongst other patentable elements, comprises (illustrative emphasis provided) "a storage management unit for allocating a portion of the local storage arrangement to the removable storage carrier and referencing the portion with identification information respecting respective access rights to a data item stored in the portion granted to the software application stored on the removable data carrier" as recited in claim 1 and as similarly recited in claim 15. As pointed out above, Sprigg as distinguished merely allocates a portion of a common storage device to both an application and data related to the application.

In addition, it is respectfully submitted that the device of claim 20 is not anticipated or made obvious by the teachings of Sprigg alone and in view of any combination of Ayat, Lee, Comerford, Chang, Barnett, Atkinson, Bonola and Lawrence. For example, Sprigg alone and in view of any combination of Ayat, Lee,

Comerford, Chang, Barnett, Atkinson, Bonola and Lawrence does not disclose or suggest a device that amongst other patentable elements comprises (illustrative emphasis provided) "a storage management unit for allocating a portion of the local storage arrangement to the removable storage carrier and referencing the portion with the identifier respecting respective access rights to a data item stored in the portion granted to the removable storage carrier" as recited in claim 20. Each of Ayat, Lee, Comerford, Chang, Barnett, Atkinson, Bonola and Lawrence are introduced for allegedly showing elements of the dependent claims and as such, do nothing to cure the deficiencies in Sprigg.

The Examiner asserts in the "Arguments Concerning Prior Art Rejections" (see, Final Office Action, page 12) that the limitations of claims 1, 15 and 20 are found at Sprigg's paragraphs [0013], [0034], [0055] and [0028]). It must be noted that these are the same sections addressed above herein. Accordingly, is it respectfully submitted that the Examiner's reliance on paragraphs [0013], [0034], [0055] and [0028]) of Sprigg is misplaced. The limitations of claims 1, 15 and 20 are not found in Sprigg (claims 1 and 15), or found in Sprigg in combination with Ayat and Lee (claim 20).

Based on the foregoing, the Applicants respectfully submit that independent claims 1, 15 and 20 are patentable over Sprigg alone, and in view of any combination of Ayat, Lee, Comerford, Chang, Barnett, Atkinson, Bonola and Lawrence. Notice to this effect is earnestly solicited. Claims 2-14 and 16-19 depend from claim 1 and accordingly are allowable for at least these reasons as well as for the separately patentable elements or subject matter contained therein.

For example, it is respectfully submitted that Sprigg alone and in view of any combination of Ayat, Lee, Comerford, Chang, Barnett, Atkinson, Bonola and Lawrence, does not disclose or suggest "wherein the identification information includes an identifier of the removable storage carrier" in claim 4; nor "wherein the identification information includes a unique identification number associated with the removable storage carrier" as recited in claim 5; nor "wherein the identification information is one or more of the following: Burst Cutting Area, a serial number associated with an individual instance of the removable storage carrier, a publisher identifier associated with a publisher of the removable storage carrier and a title identifier derived from content stored on the removable storage carrier in

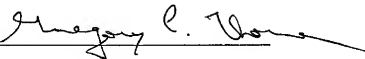
claim 6; nor "wherein the identification information is representative of a publisher of the removable storage carrier" as recited in claim 8; nor "wherein the storage management unit further enables the software application to store an additional data item in the allocated portion" as recited in claim 9; nor "wherein the storage management unit limits a size of the portion allocated to the removable storage carrier" as recited in claim 10; nor "wherein the storage management unit allocates an equal size portion to any removable storage carrier" as recited in claim 16; nor "wherein the storage management unit allocates a size of the portion based on requirements of the application" as recited in claim 17; nor "wherein the storage management unit adapts a size of the portion over time" as recited in claim 18; nor "wherein the storage management unit enlarges the size of the portion by reducing a size of another portion of the local storage arrangement allocated to another removable storage carrier" recited in claim 19.

Accordingly, separate consideration of each of the dependent claims by Sprigg in view of any combination of Ayat, Lee, Comerford, Chang, Barnett, Atkinson, Bonola and Lawrence is respectfully requested.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

Applicants have made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

By 

Gregory L. Thorne, Reg. 39,398
Attorney for Applicant(s)
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THORNE & HALAJIAN, LLP
Applied Technology Center
111 West Main Street
Bay Shore, NY 11706
Tel: (631) 665-5139
Fax: (631) 665-5101